

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

LDM TECHNOLOGIES, INC.,
a Michigan Corporation,

Plaintiff,

-vs-

ROWEN WATERS GROUP, L.L.C., a Michigan
Corporation, **MICHAEL PICKHOLZ,** an
Individual; and **PAUL RAZGUNAS,** an Individual,

Defendants.

Case No. **02-73520**
~~VICTORIA A. ROBERTS~~

Removed from Oakland County
Circuit Court, Case No. 02-042797-CZ

MAGISTRATE JUDGE SCHEER

U.S. DIST. COURT CLERK
EAST DIST. MICH.
DETROIT

02 SEP -3 P 3:18

FILED

HARNESS, DICKEY & PIERCE, P.L.C.

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NOTICE OF REMOVAL TO THE UNITED STATES DISTRICT COURT

TO: George D. Moustakas, (P-41631)
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Honorable Gene Schnelz
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Judges of the Oakland County Circuit Court
1200 N. Telegraph Road
Pontiac, Michigan 48341

Judges of the United States District Court
Eastern District of Michigan
Theodore Levin United States Courthouse
231 West Lafayette Boulevard
Detroit, Michigan 48226

PLEASE TAKE NOTICE that Defendants, ROWEN WATERS GROUP, L.L.C., MICHAEL PICKHOLZ, and PAUL RAZGUNAS have removed this action to the United States District Court for the Eastern District of Michigan pursuant to 28 U.S.C. §§ 1331, 1338, 1367, 1441, and 1446. In support of the removal of this action, the Defendants state the following:

1. On August 2, 2002, Plaintiff, LDM TECHNOLOGIES, INC. ("LDM") commenced a civil action against Defendants, ROWEN WATERS GROUP, L.L.C., MICHAEL PICKHOLZ, and PAUL RAZGUNAS (collectively "ROWEN"), in the Oakland County Circuit Court, Case No. 02-042797-CZ.

2. On or about August 12, 2002, ROWEN was served with a Summons and a copy of LDM's Complaint. (Copies of the Summons and Complaint are attached as Exhibit "A").

3. LDM asserts claims against ROWEN for the following:

a. Misappropriation of Trade Secrets;

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

SEE CASE FILE FOR
ADDITIONAL
DOCUMENTS OR PAGES
THAT WERE NOT
SCANNED